

United States District Court			
SOUTHERN DISTRICT OF FLORIDA-MIAMI DIVISION			
CRUZ VALDIVIESO FIGUERA,  <div style="text-align: center;">Plaintiffs,</div> vs.  ALL VIP CARE INC. AND LIZ VELAZQUEZ MCKINNON,  <div style="text-align: center;">Defendants.</div>		<b><u>DEFENDANT/COUNTER-PLAINTIFF'S TRIAL WITNESS LIST</u></b>  CASE NO.: 0:22-CV-61553-DIMITROULEAS/HUNT	
PRESIDING JUDGE  HONORABLE WILLIAM P. DIMITROULEAS	PLAINTIFF'S ATTORNEY  FAIRLAW FIRM Brian H. Pollock, Esq. 135 San Lorenzo Ave Suite 770 Coral Gables, FL 33146	DEFENDANT'S ATTORNEY  FLORIDA HEALTHCARE LAW FIRM. Randy M. Goldberg Esq., 151 NW 1 <sup>st</sup> Avenue., Delray Beach, FL 33444	
TRIAL DATE(S)  October 23, 2023	COURT REPORTER	COURTROOM DEPUTY	
PLF. NO	LIVE or BY DEPOSITION	ADDRESS	WITNESSES
1	Live	c/o Plaintiff's counsel	Plaintiff, <b>Cruz Valdivieso Figuera</b> (Needs Interpreter)
2	Live	c/o Def. Counsel	Defendant, <b>Liz Velasquez McKinnon</b>
3	Live	c/o Def. Counsel	<b>Diana Ramirez</b>
4	Live	3670 SW 60 <sup>th</sup> Avenue Davie, FL 33314	<b>Angela Melendez (*ND)</b>
5			<b>All Witnesses called by the Plaintiff</b>
6.			<b>All records custodians necessary to authenticate documents at issue</b>
7.			<b>All impeachment witnesses</b>

\*ND - Plaintiff objects to the Defendants' disclosure of Ms. Melendez, and to her testifying at trial, as Defendants did **not disclose** her as a witness during the discovery period, in their Answers to Interrogatories, or their Rule 26 Initial Disclosures.

Dated October 17, 2023.

/s/ RANDY M. GOLDBERG, ESQUIRE  
 Florida Healthcare Law Firm  
 FBN: 045187  
 151 NW 1<sup>ST</sup> Avenue  
 Delray Beach, FL 33444  
 754-224-0867  
 Randy@FloridaHealthcareLawFirm.com  
[RMGESquire@gmail.com](mailto:RMGESquire@gmail.com)